



State of Ohio Environmental Protection Agency

3978

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Bob Taft, Governor
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November 21, 2001

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

RE: PSP FOR PREDESIGN SAMPLING IN THE SWL AND THE FTF

Dear Mr. Reising:

Ohio EPA has reviewed the Project Specific Plan For Predesign Sampling in the Solid Waste Landfill and The Fire Training Facility, 20600-PSP-0002, Revision A Draft submitted by DOE on October 23, 2001. Ohio EPA's comments are enclosed.

If there are any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6543.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric U.S. EPA
Terry Hagen, Fluor Daniel Fernald
Francis Hodge, Tetratex
Ruth Vandegrift, ODH
Mark Schupe, HSI Geotrans

**Ohio EPA Comments on the PSP for Predesign
Sampling in the Solid Waste Landfill
and The Fire Training Facility**

- 1.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Pg. #: Line #:NA Code: C
 Original Comment #:
 Comment: Sampling was performed in both of these areas under the PSP for
 Sampling of Miscellaneous Area for OSDF WAC Attainment. Please include the
 sample results in this document.

- 2.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.0 Pg. #: Line #:NA Code: C
 Original Comment #:
 Comment: Leachate has been seen flowing from the SWL and sampled.
 Include a map showing the location of the leachate, as well as all sample results.

- 3.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.3 Pg. #: 2-2 - 2-3 Line #:NA Code: C
 Original Comment #: 1. PSP for Sampling of Miscellaneous Areas for On-Site
 Disposal Facility WAC (20600-PSP-0001, Revision 0)
 Comment: As noted in Ohio EPA's comments on the "PSP for Sampling of
 Miscellaneous Areas for On-Site Disposal Facility WAC", "due to the nature and
 variety of wastes reported" in the SWL and considering that it is landfill, "samples
 to be collected should include VOCs". Please clarify.

- 4.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.4.2 Pg. #: 2-3 Line #: 2-3 Code: C
 Original Comment #:
 Comment: This section states that "above-FRL contamination has been found at
 the 22-foot interval in the *middle section* of the SWL", while section 2.1, line 16
 states "waste material at depths up to 20 feet deep in the *southeastern corner*".
 Please clarify.

- 5.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.2 Pg. #: 3-2 Line #: 24 Code: C
 Original Comment #:
 Comment: Beginning in this section, references to different 'Zone 3' locations,
 such as "Zone 3-456" and "Zone 3-435" are made, but these locations are not
 marked on any maps in this package. Please clarify.

- 6.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.3.2 Pg. #: 3-3 Line #: 8-11 Code: C
 Original Comment #:
 Comment: As noted in Ohio EPA's comments on the "PSP for Sampling of Miscellaneous Areas for On-Site Disposal Facility WAC", all samples in this area need to be analyzed for TC-99.
- 7.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.4 Pg. #: 3-4 Line #: 1-8 Code: C
 Original Comment #:
 Comment: This section states that there is known contamination in the former open-top tank area as well where the former skid tank and pond were located. There are no samples for predesign being taken in the area of the open-top tank, and very few in the skid tank and pond area. Samples should be added to these areas.
- 8.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.5.2/Figure 3-2 Pg. #: 3-5 Line #: 17-19 Code: C
 Original Comment #:
 Comment: Ohio EPA believes that four samples in the northern portion of the east field in the FTF are not sufficient, since there is no historical data from this area to delineate the area in regards to FRL attainment. In reviewing Figure 3-2, it appears to have possible data gaps. Please clarify.
- 9.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 5.1 Pg. #: 5-3 Line #: 4-8 Code: C
 Original Comment #:
 Comment: a) Will 60 degrees Fahrenheit be sufficient to produce VOC off-gassing for head-space analysis in regards to the VOC/COCs?

 b) Is the PID measurement of 10 ppm a reasonable ionization concentration for targeting the VOCs/COC?
- 10.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 6.4 Pg. #: 6-2 Line #: 37-40 Code: C
 Original Comment #:
 Comment: This section discusses how changes will be implemented via V/FCN. In previous PSPs, the QA section has used language that refers to the fact that the V/FCN must be approved by Ohio EPA before implementing changes. Changes are defined as "significant" and "non-significant" and the definitions are made clear in the Proposed SDFP Sampling PSP Planning Guidelines.